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COUNSEL TO UPPER DARBY TOWNSHIP

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§ Chapter 11
	§
PROSPECT MEDICAL HOLDINGS, INC. <i>et al.</i>,¹	§ Case No. 25-80002 (SGJ)
	§
Debtor.	§ (Jointly Administered)
	§

WITNESS AND EXHIBIT LIST

Pursuant to Local Rule 9014-1(c), Upper Darby Township (“Upper Darby”) in the above-captioned Chapter 11 case, hereby files this Witness and Exhibit List, and designates the following witness and exhibits for use in connection with the hearing to be conducted on August 4, 2025, at 1:30 p.m. (the “Hearing”), to consider the *Debtors’ Emergency Motion For Entry Of An Order (I) Approving The Abandonment Of Certain Pennsylvania Hospitals And Related Property And (II) Granting Related Relief* [Doc. No. 2625].

WITNESSES

Upper Darby may call any one or more of the following witnesses at the Hearing:

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://omniagentsolutions.com/Prospect>. The Debtors’ mailing address is 3824 Hughes Ave., Culver City, CA 90232.

<u>No.</u>	<u>Name</u>
1.	All witnesses listed by any other party, whether or not called to testify, and not otherwise objected to by Upper Darby.
2.	All witnesses needed to authenticate or identify exhibits.
	Upper Darby reserves the right to amend and supplement this witness list.

EXHIBITS

Upper Darby may use one or more of the following exhibits at the Hearing:

<u>No.</u>	<u>Description</u>
1.	Fire Alarm Annual Report Delaware County Memorial Hospital 2023.
2.	2024 annual fire alarm and fire protection systems testing and inspection activities.
3.	July 30, 2025 email communications regarding fire protection systems.
4.	All exhibits necessary for impeachment purposes.
5.	Any other document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.
6.	Any and all documents identified or offered by any other party.
	Upper Darby reserves the right to amend and supplement this exhibit list.

RESERVATION OF RIGHTS

The foregoing lists are being submitted based on information reasonably available to Upper Darby at this time and without waving any objection as to relevance, materiality, or admissibility of evidence. Upper Darby reserves the right at any time to revise, correct, supplement, or clarify this list.

Dated: August 2, 2025.

Respectfully Submitted,

DRIVER STEPHENSON, PLLC

By: /s/ Vickie L. Driver

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Attorneys for Upper Darby Township.

CERTIFICATE OF SERVICE

I certify that on August 2, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Vickie L. Driver

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